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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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PATRICIA W. BENNETT, M.D.,

CIVIL CASE NO. 2:19-cv-20878

Plaintiff,

-against-

**DEFENDANTS' JOINT MOTION
FOR SUMMARY JUDGMENT**

CITY OF NEWARK, NEWARK DEPT.
OF HEALTH & COMMUNITY WELLNESS,
NORMA MILANES-ROBERTS, M.D., AND
MARK WADE, M.D.,

Defendants.

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PLEASE TAKE NOTICE that Defendants City of Newark (“City”), Dr. Mark Wade (“Dr. Wade”), and Dr. Norma Milanes-Roberts (“Dr. Roberts”), through counsel, hereby jointly move before the Honorable William J. Martini, U.S.D.J., as soon as the parties may be heard, for an Order granting Summary Judgment to Defendants. In support of this motion, Defendants rely on the attached brief, certification of Rachel E. Simon, Esq. dated August 1, 2023, and proposed order.

THIS JOINT MOTION is being served today pursuant to the summary judgment schedule issued in this matter on May 31, 2023, by Order of the Hon. Andre Espinosa, U.S.M.J. Per such Order, motion opposition papers must be served by October 2, 2023, replies served by November 1, 2023, and this joint motion to be filed on the docket by November 1, 2023.

PASHMAN STEIN WALDER HAYDEN, P.C.

Attorneys for Defendant Dr. Mark Wade

Dated: August 1, 2023

By: s/Rachel E. Simon

Rachel E. Simon, Esq.
For the Firm

SCHAFFER SHAIN JALLOH, P.C.

Attorneys for Defendant City of Newark

Dated: August 1, 2023

By: s/Jumba Mugwanya

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Attorneys for Defendant Dr. Norma Milanes-Roberts

Dated: August 1, 2023

By: s/Yvette Gibbons

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